

**Frederic R. Abramson, P.C.**

*Attorney at Law*

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New York, New York 10038

(212) 233-0666

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October 1, 2008

Clerk of District Court  
United States Bankruptcy Court  
South District of New York  
One Bowling Green  
New York, NY 10004-1408

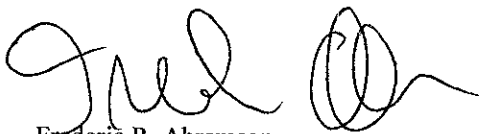
RE: In re Lehman Brothers Holding, Inc.  
Case No. 08-13555 (JMP)

Dear Clerk of District Court:

Enclosed for filing please find the formal objective of Integreon Managed Solutions, Inc. to the listed Cure Amount in Exhibit A of the Contracts and Leases to be Assumed and Assigned by Barclays along with the appropriate corresponding invoices and other documentation attached as Exhibits 1-6.

Should you have any further questions or concerns, please feel free to contact my office or Integreon's General Counsel, Erin M. Conroy, at 701-367-3801.

Sincerely,



Frederic R. Abramson  
enclosures

FILED  
U.S. BANKRUPTCY COURT  
2008 OCT -1 P 4:40  
S.D. OF N.Y.

**FREDERIC R. ABRAMSON**

160 Broadway  
Suite 500  
New York, NY 10038  
(212) 233-0666

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

FILED  
U.S. BANKRUPTCY COURT  
2008 OCT -1 P 4:40  
S.D. OF N.Y.

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In re:	.	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., et al.,	.	Chapter 11
	.	(Jointly Administered)
Debtor.	.	

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**LIMITED OBJECTION OF  
INTEGREON MANAGED SOLUTIONS, INC. TO  
PROPOSED CURE AMOUNTS AND ASSUMPTION AND  
ASSIGNMENT OF EXECUTORY CONTRACTS**

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TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Integreon Managed Solutions, Inc. ("Integreon"), files a limited objection ("Limited Objection") to the Debtors' stated cure amounts for Integreon and the assumption and assignment of its contracts, and respectfully states as follows:

**BACKGROUND**

1. On September 15, 2008, Lehman Brothers Holdings Inc. ("LBHI") commenced a case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). On September 16, 2008, LB 745 LLC ("LB 745," collectively with LBHI, "Debtors") commenced a case under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On September 17, 2008, Debtors filed various motions, including a Motion to Approve the Sale of the Purchased Assets and the Assumption and Assignment of Contracts Relating to the Purchased Assets (the "Sale Procedures Motion") and an Asset Purchase Agreement (the "Asset Purchase Agreement") that contemplates a sale of certain of the Debtors' assets to Barclays Capital Inc. ("Barclays"). On September 17, 2008, an order was entered approving the Sale Procedures Motion and a hearing to approve the sale was scheduled for September 19, 2008.

3. In the early morning hours on September 19, 2008, three separate listings of executory contracts and unexpired leases that the Debtors plan to assume and assign to Barclays pursuant to an Asset Purchase Agreement was posted on the Debtors' case information website (the "Schedules").

4. The list titled "List of IT Closing Date Contracts" Barclay's listed correctly identified Integreon's contact information; however Barclay's listed Integreon's Cure Amount as \$299,129.00.

5. The list titled "List of Non-IT Closing Date Contracts" listed Integreon's Cure Total as \$508,624.00.

6. It remains unclear whether these two amounts listed were intended to be separate or at some point overlapped.

7. According to Integreon's billing records, the total outstanding amount due and owing as of today's date is \$670,976.00 for all contracts, which are attached herein as Exhibits 1-6, respective to chronological date.

**LIMITED OBJECTION**

8. Integreon has had insufficient time and information to determine which contracts are being assumed and assigned, the amount necessary to cure any defaults under the contract and whether the proposed assumption and assignment of the contract satisfies Section 365 of the Bankruptcy Code. As with other filed Limited Objections, Integreon understands the unique nature of the circumstances present in this case. Contract counterparties, however, cannot be deprived of their right to due process.

9. To date, Integreon has received no meaningful information about the contracts being assumed and assigned and the cure amounts. Despite continued efforts on the part of Integreon's counsel, Integreon has received no contact from Barclay's personnel or counsel regarding the status of its cure amount or the corresponding contracts. Accordingly, Integreon objects to the assumption and assignment of its contract and the asserted cure amount and reserves all of its rights.

**NO WAIVER**

10. By submitting this Limited Objection to the Proposed Cure Amounts, Integreon does not waive and hereby reserves any and all objections to any proposed assumption and assignment of the contracts by the Debtors and expressly reserves their rights to amend, supplement and/or modify this Limited Objection for any reason.

**WHEREFORE**, for the foregoing reasons, the Court should not approve the assumption and assignment of Integreon's contract.

Dated: New York, New York  
October 1, 2008

Respectfully submitted,



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**FREDERIC R. ABRAMSON**

160 Broadway  
Suite 500  
New York, NY 10038  
(212) 233-0666  
Attorney for Integreon Managed  
Solutions, Inc.

**EXHIBIT 1**



**Date:** 31-Aug-08  
  
**Invoice No.:** 586.08.2008  
**Billing Period:** August 1 - 31, 2008  
**Client Code:** LB002  
**PO#** 0000061358  
**Type of Service:** Business Information Services

**Attn:** Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

**Description:** Offsite Business Information Service

	Hours worked by Shift				Total Actual Hours	Hourly Rate	Actual Charges
	Asia	London	New York	Manila			
Hours worked on behalf of							
Asia	772	91	23	194	1,080	\$18.00	\$ 19,437
London	29	1,124	128	692	1,973	\$18.00	\$ 35,513
New York	141	163	784	1,117	2,206	\$18.00	\$ 39,703
High End Pilot			24		24	\$35.00	\$ 831
<b>Total Utilized Hours</b>	<b>941</b>	<b>1,378</b>	<b>960</b>	<b>2,003</b>	<b>5,282</b>		<b>\$ 95,483</b>
Committed Hours for August 2008 - 5650 @ \$ 18/hr							\$ 101,700
Charge for Shift Leads	1	1	1	2	Monthly Rate	\$ 1,200.00	\$ 6,000.00
Onsite Rotation Charges							\$ 2,976.00
					<b>Total</b>		<b>\$ 110,676</b>

**TOTAL SERVICES** \$ 110,676  
Credit for IT Downtime \$ -  
3rd Party Expenses \$ 3,570  
Management Fee @ 15% \$ 535  
**TOTAL EXPENSES** \$ 4,105

**TOTAL INVOICE:** \$ 114,781

% of Total Hrs Utilized per Region	Charges per Region	Lehman P&L Reference #
21%	\$ 23,570	40429
38%	\$ 43,065	40437
42%	\$ 48,146	40420
<b>Total</b>	<b>\$ 114,781</b>	

**Please refer Time Sheet for Utilized Hours**

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc." at the following address :

**By Regular Mail**

Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

**By Courier/Fedex**

Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

**Domestic Wire Transfer**

ABA Number

To

ROUTING & TRANSIT #

FOR CREDIT OF

CREDIT ACCOUNT #

SIL VLY BK SJ

121140399

INTEGREON MANAGED SOLUTIONS INC

3300539173

Please refer to this invoice number:

586.08.2008

Terms:

Due upon receipt

EXHIBIT 2





Date: August 31, 2008

Invoice No.: 596.08.2008  
Billing Period: August 1 - 31, 2008  
Client Code: LB001  
Client Location: New York, London & Asia  
Type of Service: Computer Graphics  
PO #

Attn: Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

Description: Offsite Computer Graphics

Global - Offsite Services			
Billable Hours			3,560
Subtotal @ \$18/hr	\$		64,086
7 Shift Leads @ \$1,200 each	\$		8,400
Total Charges	\$		72,486
SLA Adjustments:			
Adjustment for Quality	\$		-
Adjustment for Efficiency vs Job Estimate	\$		-
Adjustment for Attrition	\$		(5,074.02)
Adjustment for IT Connectivity Downtime (see below)	\$		-
Total SLA Adjustments	\$		(5,074.02)
Lehman Onsite Rotations Charges			
	\$		9,360
3rd Party Expenses	\$		-
Management Fee @ 15%	\$		-
Fargo	\$		23,952.50
Total Expenses	\$		23,952.50
TOTAL INVOICE \$			
100,724			

Proportional Share of Charges by Region			
	%	Charges	P&L
New York	56%	\$ 56,736	
London	37%	\$ 37,321	
Asia	7%	\$ 6,668	
Global Total		\$ 100,724	

For more detail on utilization, see Billable Time and Detail (Offsite) tabs

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc."

at the following address :

By Regular Mail  
Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

By Courier/Fedex  
Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

Domestic Wire Transfer  
ABA Number  
To SIL VLY BK SJ  
ROUTING & TRANSIT # 121140399  
FOR CREDIT OF INTEGREON MANAGED SOLUTIONS INC  
CREDIT ACCOUNT # 3300539173

Please refer to this invoice number: 596.08.2008

Terms: Due upon receipt

**EXHIBIT 3**



Date: 16-Sep-08

Invoice No.: 605.09.2008  
Billing Period: September 1 - 30, 2008  
Client Code: LB002  
PO#: 0000061358  
Type of Service: Business Information Services

Attn: Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

Description: Offsite Business Information Service

	Hours worked by Shift				Total Actual Hours	Hourly Rate	Actual Charges
	Asia	London	New York	Manila			
Hours worked on behalf of							
Asia	298	29	8	113	448	\$18.00	\$ 8,062
London	33	576	57	609	1,275	\$18.00	\$ 22,957
New York	49	39	301	366	755	\$18.00	\$ 13,596
High End Pilot	-	-	30	0	30	\$35.00	\$ 1,065
Total Utilized Hours	380	644	397	1,088	2,509		\$ 45,680
Committed Hours for September 2008 - 4950 @ \$ 18/hr							\$ 89,100
Charge for Shift Leads	1	1	1	2	Monthly Rate	\$ 1,200.00	\$ 6,000.00
Onsite Rotation Charges							\$ 9,120.00
					Total		\$ 104,220

**TOTAL SERVICES** \$ 104,220  
Credit for IT Downtime \$ -  
3rd Party Expenses \$ 33,391  
Management Fee @ 15% \$ 5,009  
**TOTAL EXPENSES** \$ 38,400

**TOTAL INVOICE:** \$ 142,620

% of Total Hrs Utilized per Region	Charges per Region	Lehman P&L Reference #
18%	\$ 25,771	40429
51%	\$ 73,392	40437
30%	\$ 43,456	40420
<b>Total</b>	<b>\$ 142,620</b>	

**Please refer Time Sheet for Utilized Hours**

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc." at the following address :

**By Regular Mail**

Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

**By Courier/Fedex**

Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

**Domestic Wire Transfer**

ABA Number

To

ROUTING & TRANSIT #

FOR CREDIT OF

CREDIT ACCOUNT #

SIL VLY BK SJ

121140399

INTEGREON MANAGED SOLUTIONS INC

3300539173

Please refer to this invoice number:

605.09.2008

Terms:

Due upon receipt

**EXHIBIT 4**



Date: September 30, 2008

Invoice No.: 607.09.2008  
Billing Period: September 1 - 30, 2008  
Client Code: L8001  
Client Location: New York, London & Asia  
Type of Service: Computer Graphics  
PO #

Attn:  
Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

Description: Offsite Computer Graphics

Global - Offsite Services			
<b>Billable Hours</b>			<b>3,200</b>
Subtotal @ \$18/hr	\$		57,600
7 Shift Leads @ \$1,200 each	\$		8,400
<b>Total Charges</b>	<b>\$</b>		<b>66,000</b>
<b>SLA Adjustments:</b>			
Adjustment for Quality	\$		-
Adjustment for Efficiency vs Job Estimate	\$		-
Adjustment for Attrition	\$		(4,620.00)
Adjustment for IT Connectivity Downtime (see below)	\$		-
<b>Total SLA Adjustments</b>	<b>\$</b>		<b>(4,620.00)</b>
<b>Lehman Onsite Rotations Charges</b>			
3rd Party Expenses	\$		-
Management Fee @ 15%	\$		-
Fargo {(6 FTE's * 8 Hours * 21 Days)} * \$ 32.5	\$		32,760.00
<b>Total Expenses</b>	<b>\$</b>		<b>32,760.00</b>
<b>TOTAL INVOICE</b>	<b>\$</b>		<b>94,140</b>

Proportional Share of Charges by Region			
	%	Charges	P&L
New York	NA	NA	
London	NA	NA	
Asia	NA	NA	
<b>Global Total</b>	<b>\$</b>	<b>-</b>	

For more detail on utilization, see Billable Time and Detail (Offsite) tabs

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc."

at the following address :

By Regular Mail

Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

By Courier/Fedex

Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

Domestic Wire Transfer

ABA Number

To

SIL VLY 8K SJ

ROUTING & TRANSIT #

121140399

FOR CREDIT OF

INTEGREON MANAGED SOLUTIONS INC

CREDIT ACCOUNT #

3300539173

Please refer to this invoice number:

607.09.2008

Terms:

Due upon receipt

## EXHIBIT 5



Date: September 30, 2008

Invoice No.: 607.09.2008  
Billing Period: September 1 - 30, 2008  
Client Code: LB001  
Client Location: New York, London & Asia  
Type of Service: Computer Graphics  
PO #

Attn:  
Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

Description: Offsite Computer Graphics

Global - Offsite Services			
<b>Billable Hours</b>			<b>3,200</b>
Subtotal @ \$18/hr	\$		57,600
7 Shift Leads @ \$1,200 each	\$		8,400
<b>Total Charges</b>		\$	<b>66,000</b>
<b>SLA Adjustments:</b>			
Adjustment for Quality	\$		-
Adjustment for Efficiency vs Job Estimate	\$		-
Adjustment for Attrition	\$		(4,620.00)
Adjustment for IT Connectivity Downtime (see below)	\$		-
<b>Total SLA Adjustments</b>		\$	<b>(4,620.00)</b>
<b>Lehman Onsite Rotations Charges</b>			
3rd Party Expenses	\$		-
Management Fee @ 15%	\$		-
Fargo ((6 FTE's * 8 Hours * 21 Days))*\$ 32.5	\$		32,760.00
<b>Total Expenses</b>		\$	<b>32,760.00</b>
<b>TOTAL INVOICE</b>		\$	<b>94,140</b>

Proportional Share of Charges by Region			
	%	Charges	P&L
New York	NA	NA	
London	NA	NA	
Asia	NA	NA	
<b>Global Total</b>		\$	<b>-</b>

For more detail on utilization, see Billable Time and Detail (Offsite) tabs

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc." at the following address :

By Regular Mail  
Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

By Courier/Fedex  
Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

Domestic Wire Transfer  
ABA Number  
To: SIL VLY BK SJ  
ROUTING & TRANSIT #: 121140399  
FOR CREDIT OF: INTEGREON MANAGED SOLUTIONS INC  
CREDIT ACCOUNT #: 3300539173

Please refer to this invoice number:

607.09.2008

Terms:

Due upon receipt

## **EXHIBIT 6**





Date: July 31, 2008

Invoice No.: 525.07.2008  
Billing Period: July 1 - 31, 2008  
Client Code: LB001  
Client Location: New York, London & Asia  
Type of Service: Computer Graphics  
PO #

Attn: Accounts Payable  
F.A.O Matthew McGovern  
Lehman Brothers  
1271 6th Avenue, 41st Floor  
New York, NY 10019

Description: Offsite Computer Graphics

Global - Offsite Services			
Billable Hours			3,945
Subtotal @ \$18/hr	\$		71,010
7 Shift Leads @ \$1,200 each	\$		8,400
Total Charges	\$		79,410
SLA Adjustments:			
Adjustment for Quality	\$		-
Adjustment for Efficiency vs Job Estimate	\$		-
Adjustment for Attrition	\$		(5,558.70)
Adjustment for IT Connectivity Downtime (see below)	\$		-
Total SLA Adjustments	\$		(5,558.70)
Lehman Onsite Rotations Charges			
	\$		2,496
3rd Party Expenses	\$		-
Management Fee @ 15%	\$		-
Fargo (6 FTE's)	\$		32,532.00
Total Expenses	\$		32,532.00
TOTAL INVOICE \$ 108,879			

Proportional Share of Charges by Region			
	%	Charges	P&L
New York	57%	\$ 62,580	
London	37%	\$ 40,359	
Asia	5%	\$ 5,941	
Global Total		\$ 108,879	

For more detail on utilization, see Billable Time and Detail (Offsite) tabs

Please send your payment by \$US check in the name of "Integreon Managed Solutions, Inc." at the following address :

By Regular Mail  
Integreon Managed Solutions, Inc.  
Box 200400  
Pittsburgh, PA 15251-0400

By Courier/Fedex  
Integreon Managed Solutions, Inc.  
Attn : 200400  
500 Ross St 154 0455, Pittsburgh, PA 15251

Domestic Wire Transfer  
ABA Number  
To  
ROUTING & TRANSIT #  
FOR CREDIT OF  
CREDIT ACCOUNT #

SIL VLY BK SJ  
121140399  
INTEGREON MANAGED SOLUTIONS INC  
3300539173

Please refer to this invoice number: 525.07.2008

Terms: Due upon receipt

**AFFIDAVIT OF SERVICE**

I, Frederic R. Abramson, an attorney duly admitted to the courts of the State of New York, am not a party to the action, served a limited objection on October 1, 2008 by mailing by overnight mail to each of the following parties at the last known address set forth after each name below:


To:

Lori R. Fife and Shai Y. Waisman  
Attorneys for Lehman Brothers Holdings, Inc. and LB745 LLC  
Weil, Gotshal & Manges, LLP  
767 Fifth Avenue  
New York, NY 10153-0119

Jeffery S. Margolin  
Attorneys for the SIPC Trustee  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, NY 10004

Lindsee P. Granfield and Lisa M. Schweitzer  
Attorneys for the Purchaser  
Cleary Gottlieb Steen & Hamilton LLP  
One Liberty Plaza  
New York NY 10006

Dated: October 1, 2008

  
\_\_\_\_\_  
FREDERIC R. ABRAMSON, ESQ.  
160 Broadway  
Suite 500  
New York, N.Y. 10038  
(212) 233-0666

